

JP:NS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M12-0109

- - - - -X

UNITED STATES OF AMERICA

REMOVAL TO THE NORTHERN
DISTRICT OF NEW YORK

- against -

(Fed. R. Crim. P. 5(c))

WILLIAM KELLY,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

ALFREDO GONZALEZ, being duly sworn, deposes and says that he is a Special Agent with the United States Drug Enforcement Administration, duly appointed according to law and acting as such.

Upon information and belief, on January 18, 2012, an arrest warrant was issued by the United States District Court for the Northern District of New York, commanding the arrest of the defendant WILLIAM KELLY for conspiracy to possess with intent to distribute and distribution of cocaine base in violation of Title 21, United States Code, Sections 846 and 841.

The source of your deponent's information and the grounds for his belief are as follows:

1. On January 18, 2012, an arrest warrant was issued by the United States District Court for the Northern District of New York, commanding the arrest of WILLIAM KELLY for conspiracy to possess with intent to distribute and distribution of cocaine base in violation of Title 21, United States Code, Sections 846

and 841. Copies of the arrest warrant from the Northern District of New York and the indictment issued on January 18, 2012 by a grand jury sitting in the Northern District of New York underlying the arrest warrant are attached hereto.


2. The defendant WILLIAM KELLY was arrested by me, other agents of the Drug Enforcement Administration ("DEA"), and New York State Troopers at his residence in Queens, New York on or about February 1, 2012 pursuant to the arrest warrant from the Northern District of New York. An entry team consisting of New York State Troopers entered the defendant's residence, located the defendant and hand-cuffed him. Along with other DEA agents, I then entered the defendant's residence.

3. Before arriving at the defendant's residence, I had received a photograph of the subject of the arrest warrant from the Northern District of New York from the DEA case agent investigating the defendant. Upon entering the defendant's residence, I compared the photograph received from the case agent to the defendant and concluded that the defendant was the person depicted in the photograph.

4. In addition, while executing a search warrant of the defendant's residence, law enforcement located the defendant's United States passport, which includes a photograph of the defendant and indicates that his name is William Kelly. I asked the defendant if the United States passport belonged to him and the defendant stated that it was his passport. I also asked

the defendant if he was William Kelly and he stated that he was, in fact, William Kelly.

WHEREFORE, it is requested that the defendant WILLIAM KELLY be removed to the Northern District of New York so that he may be dealt with according to law.



ALFREDO GONZALEZ
Special Agent
United States Secret Service

Sworn to before me this
1st day of February 2012

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EA

AO 442 (Rev. 01/09) Arrest Warrant

UNITED STATES DISTRICT COURT

for the
Northern District of New YorkUnited States of America
v.

WILLIAM KELLY, a/k/a Bo

Defendant

Case No. 12-CR-014-FJS

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) William Kelly, a/k/a Bo

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment
 ☐ Superseding Indictment
 ☐ Information
 ☐ Superseding Information
 ☐ Complaint
☐ Probation Violation Petition
☐ Supervised Release Violation Petition
☐ Violation Notice
☐ Order of the Court

This offense is briefly described as follows:

conspiracy to possess with intent to distribute and distribute cocaine base, in violation of 21 U.S.C. Sections 846 and 841

U.S.D.C. FOR THE NORTHERN DISTRICT OF NEW YORK

I, the undersigned Clerk of the Court, do hereby certify that this is a true, correct and full copy of the original document on file in my custody.

 # of pages (text) 1 ; # of pages including (exhibits) 1
 Dated 1/19/2012 Lawrence K. Baerman, Clerk
 by Maria G. Blum, Deputy Clerk
Date: 01/18/2012

 Issuing officer's signature
City and state: Albany, NY

Randolph F. Treece, U.S. Magistrate Judge

Printed name and title

Return

 This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____

Date: _____

Arresting officer's signature

Printed name and title

COPY

U.S. DISTRICT COURT
N.D. OF N.Y.
ORIGINAL FILED

JAN 18 2012

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

LAWRENCE K. BAERMAN, CLERK
ALBANY

UNITED STATES OF AMERICA

INDICTMENT

v.

Crim. No. 12-CR-014-FJS

Vio: 21 U.S.C § 846
21 U.S.C. § 841(a)(1)

[2 Felony Counts and Forfeiture Allegation]

County of Offense: Rensselaer

**JERRELL WRIGHT, a/k/a Chuck, a/k/a Big Dog,
DARREN GOSS, a/k/a Slip,
TYRUN COVINGTON, a/k/a Dukes,
CALVIN B. ZEIGLER, a/k/a JB,
COREY MCCRAE, a/k/a Chi Chi,
SHAWN J. EVERETTE, a/k/a Lips,
CORY R. GOSS, a/k/a Tommy,
NIESREEN MENDE,
NATHANIEL ANDERSON, a/k/a Nate,
DEQUAN HUGGINS, a/k/a Day Day,
NATALIA LIND,
LAWRENCE KNIGHT, a/k/a L,
WILLIAM KELLY, a/k/a Bo,
RICHARD MARSHALL, a/k/a Love,
TRAVIS SCHULTZ, a/k/a Trav, and
TIAMA L. SCHULTZ,**

Defendants.

THE GRAND JURY CHARGES:

COUNT 1

Conspiracy to Possess With Intent To Distribute and Distribute Cocaine Base

From on or about August 1, 2011 through on or about January 18, 2012, in the County of Rensselaer, in the State and Northern District of New York and elsewhere, the defendants,

**JERRELL WRIGHT, a/k/a Chuck, a/k/a Big Dog,
DARREN GOSS, a/k/a Slip,
TYRUN COVINGTON, a/k/a Dukes,
CALVIN B. ZEIGLER, a/k/a JB,
COREY MCCRAE, a/k/a Chi Chi,
SHAWN J. EVERETTE, a/k/a Lips,
CORY R. GOSS, a/k/a Tommy,
NIESREEN MENDE,
NATHANIEL ANDERSON, a/k/a Nate,
DEQUAN HUGGINS, a/k/a Day Day,
NATALIA LIND,
LAWRENCE KNIGHT, a/k/a L,
WILLIAM KELLY, a/k/a Bo,
RICHARD MARSHALL, a/k/a Love,**

and others conspired to knowingly and intentionally possess with intent to distribute and to distribute a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846. That violation involved more than 280 grams of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(A).

THE GRAND JURY FURTHER CHARGES:

COUNT 2

Conspiracy to Possess With Intent To Distribute and Distribute Cocaine

From on or about August 1, 2011 through on or about January 18, 2012, in the County of Rensselaer, in the State and Northern District of New York and elsewhere, the defendants,

**JERRELL WRIGHT, a/k/a Chuck, a/k/a Big Dog,
TRAVIS SCHULTZ, a/k/a Trav,
TIAMA L. SCHULTZ,**

and others conspired to knowingly and intentionally possess with intent to distribute and to distribute a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846. That violation involved more than 500 grams of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B).

THE GRAND JURY FURTHER ALLEGES THAT:

1. Counts 1 and 2 are incorporated by reference.
2. Defendants,

**JERRELL WRIGHT, a/k/a Chuck, a/k/a Big Dog,
DARREN GOSS, a/k/a Slip,
TYRUN COVINGTON, a/k/a Dukes,
CALVIN B. ZEIGLER, a/k/a JB,
COREY MCCRAE, a/k/a Chi Chi,
SHAWN J. EVERETTE, a/k/a Lips,
NATHANIEL ANDERSON, a/k/a Nate,
NATALIA LIND,
RICHARD MARSHALL, a/k/a Love,
TRAVIS SCHULTZ, a/k/a Trav, and
TIAMA L. SCHULTZ,**

committed the above offenses after they had prior final convictions for felony drug offenses, which convictions affect the penalty provisions of Title 21, United States Code, Sections 841(b)(1) and 851.

FORFEITURE ALLEGATION

1. The allegations contained in Counts 1 and 2 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 846, the defendants,

**JERRELL WRIGHT, a/k/a Chuck, a/k/a Big Dog,
DARREN GOSS, a/k/a Slip,
TYRUN COVINGTON, a/k/a Dukes,
CALVIN B. ZEIGLER, a/k/a JB,
COREY MCCRAE, a/k/a Chi Chi,
SHAWN J. EVERETTE, a/k/a Lips,
CORY R. GOSS, a/k/a Tommy,
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NATHANIEL ANDERSON, a/k/a Nate,
DEQUAN HUGGINS, a/k/a Day Day,
NATALIA LIND,
LAWRENCE KNIGHT, a/k/a L,
WILLIAM KELLY, a/k/a Bo,
RICHARD MARSHALL, a/k/a Love,
TRAVIS SCHULTZ, a/k/a Trav, and
TIAMA L. SCHULTZ**

shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense(s).

3. If any of the property described above, as a result of any act or omission of the defendant[s]:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,


the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL,


FOREPERSON OF THE GRAND JURY

RICHARD S. HARTUNIAN
UNITED STATES ATTORNEY

By:


Daniel Hanlon
Assistant United States Attorney
Bar Roll # 514103